

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
Speech-to-Speech and Internet Protocol (IP)	)	CG Docket No. 08-15
Speech-to-Speech Telecommunications Relay	)	
Services	)	
	)	
Telecommunications Relay Services	)	CG Docket No. 03-123
And Speech-to-Speech Services for	)	
Individuals with Hearing and Speech	)	
Disabilities	)	

**COMMENT**

**Speech Communications Assistance by Telephone  
Deaf and Hard of Hearing Consumer Advocacy Network  
Telecommunications for the Deaf and Hard of Hearing, Inc.**

**National Association of the Deaf**

**Association of Late-Deafened Adults, Inc.**

**American Association of the Deaf-Blind**

**Cerebral Palsy and Deaf Organization**

**Rehabilitation Engineering Research Center on Telecommunications Access (RERC-TA)**

**California Coalition of Agencies Serving Deaf and Hard of Hearing, Inc.**

**Introduction**

Speech Communications Assistance by Telephone, a 501c3, promotes telephone access for people with speech disabilities nationwide. This document addresses issues on which the FCC requests comment in its R&O and FNPRM on Speech-to-Speech.

**1. Nationwide Provider contracted with the FCC**

The FCC begins by asking whether to have a single, nationwide provider offer both interstate and intrastate STS and IP STS. We respond that having a nationwide provider would have a positive effect on the service because it would take the funding for intrastate calls out of the states jurisdiction. To the best of our knowledge, all of the states are paying providers on a per minute basis less than it costs providers to make the service available. Consequently, the

providers have the disincentive to improve the quality of the service or the number of users. In addition, the low call volume makes it more expensive to provide STS under the administration of each state, than for the FCC to administer a single national service.

Whether such a service should have a single provider or multiple providers depends upon the expected call volume. If the call volume is high enough for multiple providers to make a reasonable profit, the choice would be to have multiple providers because competition usually increases quality of service. Obviously, if having multiple providers would result in the providers not making a profit, then having a single provider would be preferable.

## **2. Reasons for the Limited use of STS**

To respond to the question about why STS is not more widely used: as we stated above, #1 Because the providers are taking a loss on each STS call, they have no reason to provide high quality service or to do outreach. #2 Many potential users have serious multiple disabilities which prevent them from working and result in an extremely low income from SSI or similar sources. They can only pay for rent and food and cannot afford even the least expensive telephone service. #3 STS is only useful to people whose speech disability is severe enough to make them difficult to be understood by most people over the telephone. At the same time, they must speak well enough to be understood by the STS CAs who are simply patient people with excellent hearing and superior language processing ability who have been trained to handle STS calls. Users must also have the social and intellectual abilities to make a phone call.

## **3. Potential User Population**

To respond to the question about how many people potentially could use STS, we know about 2.8 million adults 15 and over (1.2 percent) reported difficulty with speech, of which 523,000 had severe difficulty (<http://www.census.gov/prod/2012pubs/p70-131.pdf>). To clarify

the number of potential STS users, contacts could be made with each of the national organizations for people with specific disabilities, which include speech disabilities. These organizations include United Cerebral Palsy, the ALS Association, American Parkinson Disease Association, etc. If the staff of these organizations can provide the parameters of who can use STS (cited above), they should be able to estimate the number of Americans with that condition who would potentially identify a need to use STS.

The user population could be increased if there was a mechanism to provide STS to consumers who can be understood by a private revoicer even though they don't speak well enough to be understood by a CA employed by the provider. Often, private revoicers are family members, caretakers, and friends who have listened to the potential user enough (sometimes over many years) to understand their extremely garbled or very soft speech. These consumers only use the telephone when their private revoicer is willing to make telephone calls for them without compensation. Under this scenario, the potential user would call the provider with the help of the private revoicer, and the private revoicer would communicate with the STS CA who could then initiate calls. The potential user (registered as described later in this document) would receive reimbursement to give to the private CA. There are many individuals, an unknown number, who could benefit if private revoicers could be reimbursed. The user and the private CA would not need to be in the same location. Extensive outreach would be necessary to make these potential STS users aware that such compensation was available. This would be equivalent of some deaf or hard of hearing individuals requesting special services of certified deaf interpreters to assist in communication facilitation between them, their contacts, and the hearing interpreters.

#### **4. A Single Outreach Provider**

The FCC asked if it would be advisable to utilize a single entity to conduct nationwide STS outreach, instead of continuing the current system. Contracting with a single entity has the advantage of: 1) requiring the FCC to pay for only one set of administrative functions rather than three, as happens now; 2) Providing that the contractor not expend resources that promote the contractor's own company, as often happens with multiple contractors; 3) Enables the contractor to conduct a nationwide media outreach program; 4) Enables the FCC to monitor the contractor more closely than with multiple contractors and 5) Enables the FCC to build requirements into the bidding process that only the one most qualified contractor can meet. However, we do believe that the provider(s) selected to do nationwide STS service be allowed to engage in marketing efforts for its brand name STS service, and be reimbursed for related expenses.

#### **5. Bundling STS with other Outreach**

The Commission asks if such a national outreach program for STS should be bundled with the new national outreach program for Internet Protocol Relay and the Video Relay Service (iTRS-NOP). We recommend against bundling because; 1) The latter program will attempt to reach the deaf population, while the STS-NOP attempts to reach people with speech disability. 2) These two populations differ in many ways and will require completely different outreach approaches. 3) Outreach staff who are knowledgeable about one of these populations are not likely to be knowledgeable about the other, and it would not be cost effective to train staff about the other population when there are already people who are knowledgeable about that population. 4) Prospective users who are deaf often belong to deaf organizations. Prospective STS users do not belong to organizations for people with speech disabilities. They are more apt to associate with organizations focused on their primary disability (which includes their speech

disability) as discussed earlier. 5) The literature about appropriate TRS services will be completely different for prospective users from each population. 6) Prospective STS users will respond best to outreach staff who also have speech disabilities, while prospective IP and VRS users will respond best to staff who are deaf; and 7) The information necessary to train users on the different services is completely different.

## **6. Payment for STS Outreach**

While we agree that STS outreach should be paid from the TRS fund given the language of Section 225, we caution that STS users are much more difficult to locate and will often require more training than users of other TRS services. We also suggest that the FCC work with other federal entities, such as Department of Health and Human Services, to establish a demonstration program to determine if it is practical to educate potential users with social and/or cognitive to use STS. It is also important to determine the size of that potential user population and the cost of providing such training.

## **7. STS Outreach Configuration**

The FCC requested additional information about conducting outreach to potential STS users. To conduct a successful nationwide outreach program, the coordinator needs to have knowledge of, and expertise in both Speech-to-Speech and the potential user population. Before an outreach plan can be established, the parameters of that population need to be defined. That might be possible through a nationwide survey of the allied medical professionals who work with them such as speech-language-pathologists (SLP), physical therapists, occupational therapists, and special education teachers. The survey should also include physical medicine physicians, neurologists, and ENT doctors. Residential facilities for people with developmental disabilities will also be able to identify some potential STS users. Such a survey was not necessary in

planning outreach to the deaf population because they are not as diverse as potential STS users. Once these parameters are known, a national outreach coordinator can be selected from people knowledgeable and having expertise on this population that falls within those parameters.

Similarly, the activities that will constitute the outreach program cannot be defined until we know these parameters. Probably, such activities will focus on one to one training of potential users because there is not enough homogeneity within that population to allow for group trainings. Knowledge of such parameters will also determine if the social media can be useful in the outreach process. To our knowledge, there has never been a commercial reason to define this population in the past because the focus has been on primary disabilities which include speech disabilities as stated above.

All questions about funding an outreach program cannot be answered until we know the population parameters and the most effective methods for teaching this population about STS. (In retrospect, those of us who designed STS in the early 1990s made unjustifiable assumptions about the size and nature of the potential STS user population. While we apologize for that oversight, we note that at that time there were no funds to do the surveys necessary to obtain that information.)

## **8. Eligibility, Registration and Verification of STS Users**

The FCC seeks comment on how to establish rules to clearly define and oversee the eligibility, registration and verification of STS users. The purpose of registration (administered by the providers or the FCC) should be 1) to identify legitimate users and encourage them to work together and in cooperation with providers and government relay administrators to build an active consumer base to improve quality of service and increase usage; 2) to reduce misuse of STS (particularly by people who are incarcerated).

Due to the small current and potential population of legitimate users, it is important that such rules do nothing to discourage their use of STS. CAs can easily identify fraudulent STS calls. Once a user has been identified, there is no need to repeat the process, because the likelihood that someone would recover from a speech disability and misuse STS is almost zero. Eligibility, registration, and verification should be as easy as possible. Many legitimate users have limited dexterity and should not be required to use a computer or the US mail to complete these processes. The verification process used for VRS should only be adopted if it can be utilized in a way that will not inconvenience users. Many users already have serious barriers to using STS and it is crucial to not increase those barriers.

There needs to be a system so that those users willing to be identified by other users can be documented (If STS continues to be administered by the states, the certification process should still be overseen by the FCC. The states have proven themselves incapable of functioning in the interest of STS users). One of the big problems in STS is that, unlike the other relay users, STS users often don't know each other. They need to be able to identify each other and work together to promote STS.

Users should only be required to self-identify as having a disability in order to register for STS and never should medical documentation be required.

## **9. Other Matters**

Users should be allowed to establish caller profiles. We agree with AAPD that the user's profile should be made available to the CA each time the user calls in, but we ask that the user be able to not make that availability the default if they wish. A caller profile would also be helpful in emergency situations. We agree with AAPD and the deaf and hard of hearing consumer groups that when an STS user is silent and does not say "good-bye," the CA should not terminate

the call until at least 60 seconds has passed; in this way, the call would not be disconnected prematurely. We also agree that the FCC should have an iTRS Advisory Council with at least some representation from the speech disabled population, and that as a part of its responsibilities, the Council has specific plans for STS as one of the forms of TRS in areas of outreach, research and development, and user experience for the purpose of ensuring high quality of STS services throughout the nation.. We recommend that the FCC establish a mandatory minimum standard for training of CAs who handle STS calls.

Respectfully submitted,

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